



SIERRA CLUB, SAN DIEGO CHAPTER
San Diego and Imperial Counties
3820 Ray Street
San Diego, CA 92104-3623

Office (619) 299-1743
Conservation (619) 299-1741
Fax (619) 299-1742
Voice Mail (619) 299-1744
EBBS (619) 299-4018

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**SUPPORTING
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San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, California 92123-4340
Attention: Paul J. Richter

Subject: Tentative Order No. R9-2002-002, NPDES No. CA019363, Waste Discharge Requirements for U.S. Navy, Naval Base Point Loma, San Diego County

Dear Mr. Richter:

The subject NPDES permit for the Naval Base Point Loma Complex is the first permit proposed for the three major Naval facilities in the San Diego area. It represents a model permit for the other two facilities, Naval Base Coronado and Naval Base San Diego. As such, we believe that the provisions of this permit must provide a significant step towards improving the water quality and protection of the marine ecosystems of San Diego Bay.

We thank you for this opportunity to submit the following comments:

1. The Fact sheet, page 21, notes that zinc anodes are used for each of the ARCO ballast tanks. We respectfully request that these zinc anodes be replaced with aluminum as a pollution prevention measure. This action will reduce the total zinc loading from the Naval Base Point Loma Complex into the San Diego Bay.
2. Paragraph D, Provisions on Page 12 of the Tentative Order requires the discharger to submit a sediment monitoring program. However, the Order does not specify the sediment concentration levels or other criteria that would trigger the need for bio-assessments of the benthic/epibenthic community in the sediments within the impacted zones of the storm water discharge locations. As indicated in the Fact Sheet (page 45) the reason for requiring sediment monitoring is because the storm water discharge locations have had historical copper and zinc concentrations in excess of the benchmark levels. Consequently, we believe that there is a high potential that the copper and zinc discharges have accumulated over time to toxic levels in the sediments. Accordingly, we request that the bio-assessment be conducted jointly with the sediment monitoring program.
3. Paragraph 3. Monitoring for Toxicity at SUBASE on page M-10 of the Monitoring and Reporting Program (MRP) requires the discharger to sample at least one industrial storm water discharge event per year. We ask that there be at least two samples. One of which should be taken from the first qualifying event of the wet season. The reason is to assess the toxicity of the material that was accumulated in the storm water collection system during the dry season.

Sincerely,

Ed Kimura
Chair, Water Subcommittee
Sierra Club, San Diego Chapter

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